

# EXHIBIT 4

VOLUME 1  
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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE  
CENTRE GMBH and WEST  
PUBLISHING CORPORATION,

Plaintiffs and  
Counterdefendants,

v.

ROSS INTELLIGENCE, INC.,

Defendant and  
Counterclaimant.

C.A. No. 20-613 (LPS)

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION of ANDREW ARRUDA

- CONDUCTED BY VIDEOCONFERENCE -

Wednesday, March 30, 2022

9:06 a.m. Pacific Daylight Time

Michelle Keegan, RMR, CRR

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Adrian Beltran, Videographer

## I N D E X

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By Ms. Cendali	9

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1

## P R O C E E D I N G S

09:06:30 2

THE VIDEOGRAPHER: Good morning, everyone.

09:06:31 3

We are on the record on March 30, 2022, at

09:06:35 4

approximately 9:06 a.m. Pacific Time, for the

09:06:40 5

remote video deposition of Andrew Arruda in the

09:06:45 6

matter of Thomson Reuters Enterprise Centre, GmbH,

09:06:52 7

et al., versus ROSS Intelligence, Inc.

09:06:54 8

My name is Adrian Beltran, and I am the

09:06:56 9

videographer for today.

09:06:58 10

Will counsel please introduce themselves

09:07:02 11

for the record, beginning with the party noticing

09:07:04 12

this proceeding.

09:07:04 13

MS. CENDALI: I'm Dale Cendali of

09:07:07 14

Kirkland &amp; Ellis. And with me is my colleague,

09:07:10 15

Eric Loverro, also from Kirkland &amp; Ellis. We are

09:07:16 16

counsel for Thomson Reuters and West Publishing.

09:07:22 17

MR. PARKER: This is Warrington Parker

09:07:24 18

appearing on behalf of ROSS Intelligence.

09:07:35 19

THE VIDEOGRAPHER: Thank you, counsel. If

09:07:37 20

that is all -- I forgot to mention also I will be

09:07:40 21

the document technician for today's deposition.

09:07:42 22

Now will the court reporter please swear

09:07:44 23

in the witness.

09:07:45 24

MS. CENDALI: Just to be clear, is there

09:07:48 25

anyone else present on the line or video?

9

09:07:53 1 MR. PARKER: Crinesha Berry from Crowell &  
09:07:56 2 Moring is on the line. She is not going to say  
09:07:58 3 anything at all. She is just watching the  
09:08:00 4 deposition.

09:08:09 5 THE VIDEOGRAPHER: Okay. Thank you. Now  
09:08:11 6 will the court reporter swear in the witness,  
09:08:13 7 please. Thank you all.

8 ANDREW ARRUDA,  
9 having been satisfactorily identified and duly  
10 sworn by the Notary Public, was examined and  
11 testified as follows:

12 EXAMINATION BY COUNSEL FOR  
13 THOMSON REUTERS AND WEST PUBLISHING  
09:08:38 14 BY MS. CENDALI:

09:08:38 15 Q. All right. I take it, then, we're ready  
09:08:40 16 to start.

09:08:41 17 Could you please state your full name and  
09:08:42 18 address for the record.

09:08:43 19 A. Andrew, regular spelling, Arruda,  
09:08:47 20 A-R-R-U-D-A. My middle name is M.J., all capital  
09:08:53 21 letters. And my address is 536 27th Street,  
09:08:58 22 Unit 3, San Francisco 94131.

09:09:02 23 Q. Is that your personal address?

09:09:03 24 A. It is. Yeah.

09:09:04 25 Q. Do you have a business address?

11

09:10:28 1 A. After.

09:10:30 2 Q. Is anyone who was involved with ROSS  
09:10:37 3 Intelligence, Inc., involved in Automate Medical?

09:10:41 4 A. Yes.

09:10:43 5 Q. Who?

09:10:43 6 A. Thomas Hamilton. He was Employee Number 1  
09:10:48 7 at ROSS, and he's one of the cofounders of mine at  
09:10:52 8 Automate Medical.

09:10:52 9 Q. And what does Mr. Hamilton do at Automate  
09:10:57 10 Medical?

09:10:57 11 A. He's the cofounder, chief operating  
09:11:00 12 officer.

09:11:01 13 Q. Does Automate Medical use any of ROSS  
09:11:10 14 Intelligence technology?

09:11:10 15 A. No.

09:11:12 16 Q. Does Automate Medical engage in using AI?

09:11:21 17 A. No.

09:11:22 18 Q. Are you -- were you the cofounder and CEO  
09:11:39 19 of ROSS Intelligence?

09:11:40 20 A. Yes.

09:11:43 21 Q. During what period of time did you serve  
09:11:49 22 as CEO for ROSS?

09:11:50 23 A. From the inception of it up until the time  
09:11:57 24 that we shifted our focus because of this  
09:12:02 25 litigation.

12

09:12:04 1 Q. So is that from September of 2014 to  
09:12:07 2 December of 2020?

09:12:08 3 A. That sounds correct. But without seeing  
09:12:14 4 documents -- but that sounds about right.

09:12:17 5 Q. Do you have a current role with ROSS?

09:12:19 6 A. I continue to serve on its board.

09:12:23 7 Q. Who else is on the board of directors of  
09:12:26 8 ROSS?

09:12:27 9 A. Jimoh Ovbiagele, Karamdeep Nijjar, and  
09:12:38 10 Jack Newton, with an observer seat by Andrew  
09:12:41 11 Cleland.

09:12:42 12 Q. Could you please tell me about each of  
09:12:46 13 these people. Who are they?

09:12:48 14 A. Jimoh Ovbiagele was a cofounder, CTO at  
09:12:52 15 ROSS Intelligence. Karamdeep Nijjar is a venture  
09:12:56 16 capitalist at Inovia Capital. Jack Newton is the  
09:13:00 17 CEO, cofounder of a company called Clio. And  
09:13:04 18 Andrew Cleland is a venture capital partner at  
09:13:08 19 Comcast Ventures.

09:13:09 20 Q. When was the last time there was a board  
09:13:13 21 meeting of ROSS?

09:13:13 22 A. Upon us getting into this litigation. I'm  
09:13:20 23 not sure the exact date, but it was around the  
09:13:23 24 tail end upon our shift of focus.

09:13:27 25 Q. Well, when you say "shift in focus," what



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## STATE OF CALIFORNIA

I, Michelle Keegan, Registered Merit Reporter and Certified Shorthand Reporter for the State of California, do hereby certify that ANDREW ARRUDA, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record, to the best of my ability, of the testimony given by the witness.

I further certify that I am neither related to or employed by any of the parties in or counsel to this action, nor am I financially interested in the outcome of this action.

In witness whereof, I have hereunto set my hand and seal this 11th day of April, 2022.

A handwritten signature in black ink, appearing to read "Michelle Keegan", is written over a horizontal line.

Michelle Keegan, CSR No. 13632

**Signature and Errata Sheet**  
**March 30, 2022 Deposition of Andrew Arruda**  
*Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation v. ROSS*  
*Intelligence Inc.*

I, Andrew Arruda, have reviewed the attached transcript of my March 30, 2022 deposition testimony and certify, pursuant 28 U.S.C. § 1746 that the attached transcript is my true and correct testimony during that deposition, subject to the corrections shown below.

Page/Line	Now Reads	Correction	Reason
23:17	any	anything	Transcription error
50:15	co.	company	Transcription error
51:15	“how.”	“how?”	Transcription error
53:21	ROSS	results	Transcription error
81:2	hard	all	Transcription error
164:4	would it look if	would it look like if	Clarification
171:24	“\$MB ARR to +1M.”	“SMB ARR to +1M.”	Transcription error
210:12	MR. PARKER	MS. CENDALI	Transcription error

Executed on May 10, 2022, at San Francisco, CA.

/s/ 